

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: : Case No. 16-11169-sr
Derrick H. Garner, :
Debtor : Chapter 13

REPLY TO TRUSTEE'S MOTION TO DISMISS

1 - 2. Admitted.

3. Debtor has only recently begun to receive pension payments from his former employer, Philadelphia Police Department, and is now able to make payments, the first of which will be on or about November 3, 2016.

4. Debtor has only recently begun to receive pension payments from his former employer, Philadelphia Police Department, and is now able to adequately fund his Chapter 13 Plan.

Respectfully submitted,



John S. Di Giorgio, Esquire
1706 Race Street, Suite 404
Philadelphia, PA 19103
Telephone: 215-568-2266
Facsimile: 215-405-2920
Attorney for Debtor,
Derrick H. Garner